UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

Chapter 11 Case No.

OCT - 6 2010

U.S. BANKRUPTCY COURT, SDNY

JMP

LEHMAN BROTHERS HOLDINGS INC., et al.,

08-13555 (JMP)

Debtors.

(Jointly Administered)

September 30, 2010

The chambers of the Honorable James MxPeck,

One Bowling Green,

New York, New York 10004,

Courtroom 601.

Attorneys for the Debtors,

Weil Gotshal & Manges LLP,

767 Fifth Avenue,

New York, New York 10153.

Attn: Shai Waisman, Esq.

The Office of the United States Trustee for the Southern District of New York,

33 Whitehall Street,

21st Floor,

New York, New York 10004.

Attn: Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq.,

Brian Masumoto, Esq., Linda Riffkin, Esq., and

Tracy Hope Davis, Esq.

Attorneys for the official committee of unsecured creditors appointed in these cases,

Milbank, Tweed, Hadley & McCloy LLP,

1 Chase Manhattan Plaza,

New York, New York 10005.

Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq.,

and Evan Fleck, Esq.

Dear Sirs,

OPPOSITION TO THE OBJECTION

CLAIM TO BE DISALLOWED	& EXPUNGED	
Creditor Name and Address: ABLEMEN & ASSOCIATES LTD FLAT E, 3 RD FLOOR, BLOCK B, NING YEUNG TERRACE 78 BONHAM ROAD HONG KONG, CHINA	Claim Number: Date Filed: Debtor: Classification and Amount:	66159 1/21/2010 08-13555 UNSECURED: \$20,000.00 UNLIQUIDATED

We refer to the Notice of the Objection dated September 13, 2010 requesting the Bankruptcy Court to expunge, reduce, reclassify, and/or disallow our claim listed above on the ground that the said claim violates the Bankruptcy Court's July 2, 2009 order setting forth the procedures and deadlines for filing proofs of claim in these chapter 11 cases (the "Bar Date Order") [Docket No. 4271], as they were filed after the November 2, 2009 bar date.

We oppose the Objection on the ground that the delay in filing of the claim listed above was due to the holding up of the mail consisting of our claim forms by the US Customs Office on October 24, 2009. We were not aware of the holding-up until late December 2009 when we found that our claim was not listed in the website address: http://chapter11.epiqsystems.com/LBH.

We enclose a list of correspondences/emails in respect of the event for your consideration.

We sincerely hope that you would consider our reason of opposition and allow our claim as filed.

Yours faithfully,

For and on behalf of

ABLEMEN & ASSOCIATES LIMITED

Director

Encl.

LIST OF DOCUMENTS

- (A) Notice of Hearing on Debtors' Forty-Second Omnibus Objection to Claims(Late-filed Lehman Progams Securities Claims)
- (B) Certificate of purchase of postage stamps and mailing label dated October 23, 2009
- (C) E-mail sent to Epiq Bankruptcy Solutions, LLC ("Epiq") on December 17, 2009 asking the status of claim forms
- (D) E-mail enquiry from staff of our company sent to Hong Kong Post on December 29, 2009
- (E) A reply letter from Hong Kong Post on January 12, 2010
- (F) Reply e-mail from Epiq sent on January 15, 2010 and our reply on the same date
- (G) E-mail to Epiq sent on January 17, 2010 asking them to check the mail with US Customs Office
- (H) E-mail reply from Epiq sent on January 21, 2010 re checking with US Customs Office and our reply e-mail to Epiq sent on the same date asking whether the claim forms can be accepted by e-mails.
- (I) Follow up e-mail to Epiq sent on January 27, 2010 and e-mail confirmation from Epiq sent on January 28, 2010 that the claim forms were input on January 21, 2010.

UNITED STATES BANKRU	JPTCY COURT
SOUTHERN DISTRICT OF	NEW YORK
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In re

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.

Chapter 11 Case No.

08-13555 (JMP)

(Jointly Administered)

LBH OMNI42 09-13-2010 (MERGE2,TXNUM2) 4000113397 MAIL ID *** 0033298650 *** BSIUSE: 103

ABLEMEN & ASSOCIATES LTD FLAT E, 3RD FLOOR, BLOCK B, NING YEUNG TERRACE 78 BONHAM ROAD HONG KONG, CHINA

THIS IS A NOTICE REGARDING YOUR CLAIM(S). YOU MUST READ IT AND TAKE ACTION IF YOU DISAGREE WITH THE OBJECTION.

IF YOU HAVE ANY QUESTIONS ABOUT THIS NOTICE OR THE OBJECTION, PLEASE CONTACT DEBTORS' COUNSEL, CASEY BURTON, ESQ., AT 214-746-7700.

NOTICE OF HEARING ON DEBTORS' FORTY-SECOND OMNIBUS OBJECTION TO CLAIMS (LATE-FILED LEHMAN PROGRAMS SECURITIES CLAIMS)

CLAIM TO BE DISALLOWED & EXPUNGED 66159 Claim Number: Creditor Name and Address: 1/21/2010 Date Filed: ABLEMEN & ASSOCIATES LTD FLAT E, 3RD FLOOR, BLOCK B, NING YEUNG 08-13555 Debtor: TERRACE UNSECURED: \$ 20,000.00 78 BONHAM ROAD Classification and Amount: HONG KONG, CHINA UNLIQUIDATED

PLEASE TAKE NOTICE that, on September 13, 2010, Lehman Brothers Holdings Inc. and certain of its affiliates (collectively, the "<u>Debtors</u>") filed their Forty-Second Omnibus Objection to Claims (Late-Filed Lehman Programs Securities Claims) (the "<u>Objection</u>") with the United States Bankruptcy Court for the Southern District of New York (the "<u>Bankruptcy Court</u>").

The Objection requests that the Bankruptcy Court expunge, reduce, reclassify, and/or disallow your claim(s) listed above under CLAIM(S) TO BE DISALLOWED & EXPUNGED on the ground that said claims(s) violate the Bankruptcy Court's July 2, 2009 order setting forth the procedures and deadlines for filing proofs of claim in these chapter 11 cases (the "Bar Date Order") [Docket No. 4271], as they were filed after the November 2, 2009 bar date. Any claim that the Bankruptcy Court expunges and disallows will be treated as if it had not been filed and you will not be entitled to any distribution on account thereof.

If you do NOT oppose the disallowance, expungement, reduction or reclassification of your claim(s) listed above under CLAIM(S) TO BE DISALLOWED & EXPUNGED, then you do NOT need to file a written response to the Objection and you do NOT need to appear at the hearing.

If you DO oppose the disallowance, expungement, reduction or reclassification of your claim(s) listed above under CLAIM(S) TO BE DISALLOWED & EXPUNGED, then you MUST file with the Court and serve on the parties listed below a

A list of the Debtors, along with the last four digits of each Debtor's federal tax identification number, is available on the Debtors' website at http://www.lehman-docket.com.

08-13555-mg Doc 11950 Filed 10/06/10 Entered 10/13/10 14:48:21 Main Documen Pq 4 of 11 Speed Page 香港郵政 HONGKONG POST 郵件編號 item No. EA 010 647 783 HK 寄件人姓名及地址 NAME AND ADDRESS OF SENDER 收件人姓名及地址 NAME AND ADDRESS OF ADDRESSEE EPIQ BANKRUPTCY SOLUTIONS, LLC ABLEMEN & ASSOCIATES LTD. FLAT E, 3/F, BLOCKB, NING YEUNG TERRACE, 78 BONHAM ROAD, HONG KONG AHn: LEHMAN BROTHERSHOLDINGS CLAIMS PROCESSING 757 THIRD AVENUE, 3RD FLOOR 電話 / 傳真 *(852) - 48588787* HONG KONG NEW YORK, NY 10017 Postal Code (if any) 證明文件及 發貨單數目 Number of certificates and Date(投稿日期):23/10/09 14:15 Officer(職員):HKP00337 g Office(投客局) (FO 暴政機局 invoices Item Sepial No. 13 CIY AR. KP . . Mgt. KG. Payment 数置 BAOLOGE TRANK(D) US N N O 0.050

Net Amount (實行金額): IKS 付實方法 國家 回執 文件级 重量(公斤) No. -Śtano П 是 Yes 投保金額 Sum Insured 日期及寄件人装置
Date and Sender's Signature

宏在此地址客所填稿的個人資料,看着等取用作成理您的投資事宜。管理等取或某他具备港调政有案務來往的機構
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上門收件職員簽署

Signature of Collection Officer

問報

Time

田期

Date

Datestamp

購買郵票及郵用物品證明書 Hongkong Post 香港郵政 **CERTIFICATE OF PURCHASE** POSTAGE STAMPS AND POSTAL ITEMS Linking people Delivering business 傳心意 滅商機 總額 郵票/集郵紀念品 **Total Amount** Postage stamps/Philatelic products 港幣 Stationery items HK\$ 郵趣廊精品 Postshop souvenirs 日戳

注意事項

(1) 本證明書只按顧客的要求而發出。有關要求必須在購買有關物品時提出。由於本署不會把有關購買物品資料留有記錄,因此顧客離開櫃位後才提出要求,本署將不會受理。(2) 倘若顧客在購買物品時已獲本署發出收條,本署將不會發出此證明書。

Attention

(1) This certificate is issued only at the time of the transaction upon request by customers. As we do not keep record, we shall not be able to entertain any request made after a customer has left the counter.

(2) If we have already given a receipt for your purchase, this certificate will not be issued.

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Raymond Lau

From:

Raymond Lau [raymondlau@ablemen.com.hk] on behalf of Raymond Lau

Sent:

Thursday, December 17, 2009 4:30 PM

To:

webmaster@epiqsystems.com

Cc:

alica.bau@rbs.com

Proof of Claim

Attachments: LB Proof of claim 1.pdf; LB Proof of claim 2.pdf; LB Proof of claim 3.pdf

Dear Sirs,

Subject:

We would like to check whether our Claim forms (3) have been received by you.

These forms were sent to your office by Speed Post from Hong Kong on 23 October, 2009.

Regards,

LAU Siu Yin

Director,

Ablemen & Associates Ltd.

FACSIMILE 圖文傳真

Attention to 送星	陳小姐
Department 部門:	
Company 公司: Hong Kong Post	9-
Fax. No. 傳真號碼: 28684763	
From 發件人: Conita Ma	Ref.No. 文件編號:
Date 日期: 29/12/09	Total pages 包括此页 including this page 頁數共: 之

Dear Me Chax, (29212211)

Further to our earlier telephone Conversation, kindly follow up my document reb. no. EA010647783HK

posted on 23/10/09.

My contact tel. no. 28 21670333. and fax no. is 23682665.

Thanks and regards, Conita Ma





來函檔號 Your ref.:

本署檔號 Our ref:

09351986A

傳真 Fax: 2868 4723

電話 Tel: 2921 2211

香港堅尼地城 石山街十二號 堅尼地城社區綜合大樓十二樓 香港郵政郵件查詢組 網址:www.hongkongpost.com

Hongkong Post Mail Tracing Office 12/F, Kennedy Town Community Complex 12 Rock Hill Street Kennedy Town, Hong Kong website: www.hongkongpost.com

12 Jan 2010

MS CONITA MA ABLEMEN & ASSOCIATES LTD

Dear Ms. Ma,

Speedpost Item No. :

EA010647783HK

Posted on :

23 Oct 2009

Addressed to :

EPIQ BANKRUPTOY SOLUTIONS, LLC

UNITED STATES

Thank you for your enquiry of 29 Dec 2009 regarding a Speedpost item.

Our counterpart in United States advised that the item was held in Customs office since 24 Oct 2009. Kindly informed addressee to contact with concerned Customs office for further information and arrangement.

Details of the Customs Office are as follow:

website:

http://www.customs.gov/xp/cgov/travel/customerservice/

Tel. No.:

1-877-227-5511 (Domestic) or 703-526-4200 (International).

Hours:

Mon-Fri 8:30 am-5:00 pm EST.

If I can be of any further help, please do not hesitate to contact us at 2921 2211, quoting the reference number 09351986A.

Yours sincerely,

(C.H. Yuen)

for Manager (Mail Tracing Office)

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Raymond Lau

From: Raymond Lau [raymondlau@ablemen.com.hk] on behalf of Raymond Lau

Sent: Friday, January 15, 2010 11:53 AM

To: Black, Linda

Subject: RE: Lehman Brothers

Dear Linda,

The phone number is correct, but you better try my cell phone (852) 98629908.

Raymond LAU Ablemen & Associates Ltd.

From: Black, Linda [mailto:lbla@epiqsystems.com]

Sent: Friday, January 15, 2010 12:47 AM **To:** raymondiau@ablemen.com.hk

Subject: Lehman Brothers

The phone group is trying to contact you but the phone number provided does not work. Could you please email me your phone number. This is the number we are trying to call.

Phone: (852) 28588787

Is this correct? Thank you,

LINDA BLACK Project Coordinator

Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd Beaverton, OR 97005 Phone: 503.350.5944

Fax: 503.350.5944

Email: lblack@epigsystems.com

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Message

Chicago | Kansas City | London | Los Angeles | Miami | New York | Philadelphia | Portland | Washington DC

From: Raymond Lau [mailto:raymondlau@ablemen.com.hk]

Sent: Sunday, January 17, 2010 8:19 PM

To: Black, Linda

Subject: RE: Lehman Brothers

Dear Linda,

I'm sorry I missed the phone call from your office at 8:30am, 16 January, 2010, Hong Kong time.

Actually, I want to report that I had sent 3 forms of Proof of Claim in respect of Lehman Securities to Epiq Bankruptcy Solutions, LLC by Speed post on 23 October, 2009. Unfortunately, the mail was held in the US Customs Office since 24 October for inspection.

(a letter from HK Post is attached for your reference.)

I would like to ask whether I should re-send the 3 Claim Forms (copies attached) to your office right now or Epiq would contact the

Customs Office for collecting the kept mail.

Details of the Customs Office contact are:-

Website: http://www.customs.gov/xp/cgov/travel/customerservice/
Tel. no.: 1-877-227-5511 (Domestic) or 703-526-4200 (International).

Please advise by return e-mail.

Thanks a lot.

Raymond LAU Director Ablemen & Associates Ltd. 08-13555-mg Doc 11950 Filed 10/06/10 Entered 10/13/10 14:48:21 Main Document Pg 10 of 11

From: Raymond Lau

Sent: Thursday, January 21, 2010 4:40 PM

To: Black, Linda

Subject: RE: Lehman Brothers

Dear Linda,

Thanks for your follow up and reply.

Could you send my last e-mail and attachments to the Claims team manager and see whether they serve the

purposes.

Thanks a lot.

Raymond LAU Director Ablemen & Associates Ltd.

From: Black, Linda [mailto:lbla@epiqsystems.com]

Sent: Thursday, January 21, 2010 12:43 AM

To: raymondlau@ablemen.com.hk Subject: FW: Lehman Brothers

Hello,

The claims team manager contacted customs and this was his reply.

Unfortunately, US Customs does not track any packages and it's up to the sender to make sure that the packages clear customs and arrive on time. Please advise the creditor to resend her claims along with a letter explaining the situation, so that the Debtors can see the reason for the late filed claim. Thanks.

You can send that information to the NY office.

Thank you,

LINDA BLACK **Project Coordinator**

Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd Beaverton, OR 97005 Phone: 503.350.5944

Fax: 503.350.5944

Email: Iblack@epigsystems.com

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From: Black, Linda

28/9/2010

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From: Black, Linda [mailto:lbla@epiqsystems.com] 1 of 11

Sent: Thursday, January 28, 2010 12:01 AM

To: Raymond Lau

Subject: RE: Lehman Brothers

I am sorry, I thought you were checking the website. The claims appear to be 66158, 66159 and 66112. They were input on 1/21.

You can check these at lehman-docket.com.

Thanks for your patience,

LINDA BLACK **Project Coordinator**

Epiq Systems Class Action & Claims Solutions 10300 SW Allen Blvd Beaverton, OR 97005 Phone: 503.350.5944

Fax: 503.350.5944

Email: Iblack@epigsystems.com Innovative technology solutions for litigation, bankruptcy and financial transactions Chicago | Kansas City | London | Los Angeles | Miami | New York | Philadelphia | Portland | Washington DC

From: Raymond Lau [mailto:raymondlau@ablemen.com.hk]

Sent: Wednesday, January 27, 2010 2:14 AM

To: Black, Linda

Subject: FW: Lehman Brothers

I refer to my last email to you on 21 Jan. and would like to have feedback as soon as possible.

Thanks.

Raymond LAU Director Ablemen & Associates Ltd.

From: Raymond Lau

Sent: Thursday, January 21, 2010 4:40 PM

To: Black, Linda

Subject: RE: Lehman Brothers

28/9/2010